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March 2, 2000

Mr. K. David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

> In Re: Yorkville Telephone Cooperative, Inc. IntraLATA Dialing Parity Implementation Plan Docket No. 99-00298

Dear Mr. Waddell:

In response to the request of the Tennessee Regulatory Authority, I am enclosing for filing an original and thirteen (13) copies of replacement pages 2, 5, and 6 of the Yorkville Telephone Cooperative IntraLATA Toll Dialing Parity Implementation Plan.

Replacement page 2 deletes the phrase "as long as technically feasible" which was previously found at the end of the third paragraph under "II. IntraLATA Environment." Replacement page 5, which is Exhibit A to the Plan, rewrites the language of the direct mailing to the Company's members. Replacement page 6, which is Exhibit B to the Plan, corrects the amount in Step 1 of incremental costs from \$42,000.00 to \$42,500.00, and includes in footnote 1 an explanation of what this amount consists of. Replacement page 6 also includes a re-calculation of the cost recovery rate in Step 3 to correct a mathematical error contained in original page 6.

It is my understanding that these replacement pages will be substituted for their original counterparts in the Yorkville Telephone Cooperative, IntraLATA Toll Dialing Parity Implementation Plan when it is presented to the Directors.

If you have any questions, do not hesitate to contact me or Mr. W. T. Sims, Manager of the Yorkville Telephone Cooperative, Telephone No. (901)643-6121.

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R. Dale Grimes

RDG/jm Enclosures

Richard Collier, Esq. cc:

Mr. W. T. Sims

Thomas J. Moorman, Esq. Margaret Nyland, Esq.

I. Purpose

REC'D TH REGULATION AUTH.

Yorkville Telephone Cooperative (Yorkville) describes herein the process for implementing intraLATA toll Dialing parity in the Yorkville exchanges located in the state of Tennessee. The intent of this Plant 3 10 is to provide a proposal that, upon implementation, would provide customers the ability to select the participating telecommunications carrier of their choice for routing their intraLATA toll calls. Yorkville will associate with the LATA 468 for the purposes of providing toll dialing parity as will as its provision for interLata equal access.

II. IntraLATA Environment

Yorkville customers can currently dial an access code to complete intraLATA toll calls to another carrier. After implementation of this intraLATA Toll Dialing Implementation Plan (the "Plan"), customers will be able to subscribe to the carrier of their choice for intraLATA as well as interlata service (two PIC subscription capability). Customers will dial 1+ the area code and number to complete calls using their presubscribed carrier. If customers wish to complete a call using a carrier other than their subscribed carrier, they will need to dial the carrier's access code (i.e., 101XXXX).

Each end office switch will be equipped with the capability of allowing each end user subscriber to select "no-PIC" as a valid intraLATA subscription selection. Customers selecting "no-PIC" as their subscribed carrier will not be able to make intraLATA tolls on a 1+ or 0+ dialed basis. Such customer will need to dial an access code each time he or she makes an intraLATA call.

In 1992, toll-free intraLATA county-wide calling was initiated for all Local Exchange Carrier's via an order from the Tennessee Public Service Commission. BellSouth Telecommunications Inc. ("BellSouth") currently maintains tax-code billing tables to identify "free-county-wide" intraLATA toll calls originated by Yorkville intraLATA toll customers and to ensure that billing does not occur on these calls. Yorkville will continue to process toll-free intraLATA county-wide calls in this matter for toll customers after implementation of intraLATA toll dialing.

III. Implementation Schedule

Yorkville will provide intraLATA toll dialing parity in Tennessee on March 31, 2000 in conjunction with it's proposed implementation of interLATA equal access.

IV. Carrier Selection Procedures

Yorkville will implement the full Two-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full two-PIC methodology, customers will be able to subscribe to one telecommunications carrier for interLATA toll calls and subscribe to the same or a different participating telecommunications carrier, for all intraLATA toll calls. Orders for changes will be accepted and processed beginning on the implementation date.

Yorkville employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain to customers the process for making PIC changes for intraLATA toll calls. Business Office personnel and the Customer Account Records system will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

¹ Concurrently with the filing of this Plan, Yorkville is filing with The Tennessee Regulatory Authority ("TRA") a Petition for Modification ("Petition") of the time frames for implementing intraLata toll dialing parity that were prescribed by the Federal Communications Commission ("FCC") as well as the FCC's "default" carrier rules. The March 31, 2000 date noted herein is based on the assumption that the TRA will approve Yorkville's Petition for the reasons stated therein.

Exhibit A

BILL MESSAGE

"Yorkville Telephone Cooperative implemented local toll 1+ subscription service on March 31, 2000. You are now able to choose a local toll provider. Your current carrier will continue to provide this service for you or you may select another carrier. You may select the same provider as your interstate long distance service provider or you may select a different provider for each service. Your first selection prior to June 30, 2000 will be free.

DIRECT MAILING

Dear Yorkville Telephone Cooperative Members,

In our effort to comply with recent telecommunications legislation, which requires allowing all telephone subscribers to select their long distance company, we recently sent you a "ballot". You may have noticed that your current long distance company was not listed on the ballot. Since the ballots were mailed, it has been brought to our attention that without the existing companies on the ballot, you may not have been given a fully competitive option. Therefore, we found it necessary to invalidate any ballot you may have returned. We submitted a revised Toll Dialing Parity Plan to the Tennessee Regulatory Authority (TRA), which has jurisdiction in these matters. The Plan has been approved and will be implemented on March 31, 2000. The details of the plan as they affect you are described below.

Yorkville Telephone Cooperative - Approved Toll Dialing Parity Plan

Beginning on March 31, 2000 all subscribers will have the option to select an IntraLata and InterLata long distance company from a list of companies who have chosen to provide service in the Yorkville Telephone Cooperative exchange areas. IntraLata calls are those calls made within the boundaries of Tennessee, west of the Tennessee River. InterLata calls are those calls made outside the boundaries of Tennessee, and within the State, east of the Tennessee River. You may select different companies for your IntraLata and InterLata calls or may use the same one, assuming the company you select provides both services. The "provider list" of long distance companies will be maintained in the Yorkville Cooperative office.

If you wish to remain with your existing long distance company, no action is required on your part. You will continue to receive long distance services as you do today. However, if you wish to select one of the companies on the provider list you may call us at 643-6121, come by our new business office at 4 Newbern Highway in Yorkville, or respond to competitive advertising material from the long distance companies and they will notify us of your choice. You will not be charged for changing your long distance company, if you respond prior to June 30, 2000.

We sincerely apologize for any inconvenience this may have caused you. It is our desire to make this change as easy as possible for our members. If you have any questions or comments, please come by or call the business office at 643-6121.

Exhibit B

TENNESSEE METHODOLOGY FOR RECOVERY OF COSTS ASSOCIATED WITH IMPLEMENTATION OF INTRALATA SUBSCRIPTION

CALCULATION OF INITIAL EQUAL ACCESS RATE ELEMENT

Step 1: Identify the estimated total incremental costs directly attributable to the provisioning of IntraLata Subscription.

\$42,500.00¹

Step 2: Identify estimated total Intrastate/IntraLATA minutes of use for the 4 year recovery period.

4,378,056

Step 3: Calculate a cost recovery rate by dividing amount in Step 1 by the Minutes of Use in Step 2.

\$0.0097

ANNUAL TRUE-UP OF EQUAL ACCESS RATE ELEMENT

Repeat Steps 1 through 3 and calculate an updated access rate element by dividing amount in Step 1, adjusted by the previous year/years cost recovery.

¹This estimated cost figure consists of software costs associated with conversion to equal access and the multi-pick capability required for IntraLATA toll dialing parity.